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U.S. DISTRICT COURT  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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IN RE: VITAMINS ANTITRUST-CLASS  
ACTIONS

Misc. No. 99-197 (TFH)  
MDL No. 1285

This document relates to :

Blue Seal Feeds, Inc., et al. v.  
Akzo Nobel Inc., et al.,  
99-CV-2683 (TFH)

Cactus Operating Limited, et al. v.  
Akzo Nobel Inc., et al.,  
99-CV-2684 (TFH)

Marshall Durbin Farms, Inc., et al.:  
v. Akzo Nobel Inc., et al.,  
99-CV-2785 (TFH)

Southern States Cooperative, Inc., :  
et al. v. Akzo Nobel Inc., et al., :  
99-CV-2685 (TFH) :

Tyson Foods, Inc., et al., v. Akzo :  
Nobel Inc., et al., :  
99-CV-2681 (TFH) :

**FILED**

APR 11 2000

NANCY MAYER-WHITTINGTON, CLERK  
U.S. DISTRICT COURT

STIPULATION CONCERNING THE TIME OF AKZO NOBEL  
N.V. TO RESPOND TO THE COMPLAINTS IN THE  
CAPTIONED ACTIONS

IT IS HEREBY STIPULATED AND AGREED, by and between  
counsel for plaintiffs in the captioned actions and counsel for  
defendant Akzo Nobel N.V., that the time for defendant Akzo No-  
bel N.V. to move, answer or otherwise respond to the complaints  
in the captioned actions, shall be as follows:

1. If Akzo Nobel N.V. wishes to move to dismiss the complaints in the captioned actions on the grounds that service of process was improper under the Hague Convention or for lack of "national contacts", it must serve its motion on these bases on or before April 7, 2000. The time for Akzo Nobel N.V. to move to dismiss on any other grounds is extended as set forth below.

2. Except as set forth in paragraph 3, the time for Akzo Nobel N.V. to move to dismiss on any basis other than those identified in paragraph 1, answer or otherwise respond to the complaints in the captioned actions is extended to and including the day twenty (20) days after the day the Court's decision on the personal jurisdiction issues argued before the Court on March 16, 2000, is entered in the Civil Docket for the captioned matter, MDL No. 1285.

3. If the Court decides that personal jurisdiction should be determined on the basis of a foreign defendant's contacts with the transferor forum, then the time for Akzo Nobel N.V. to move to dismiss on any basis (other than improper service under the Hague Convention), answer or otherwise respond to the complaints in the captioned actions is extended to and including the day thirty (30) days after the day the Court's decision referred to above is entered in the Civil Docket for the captioned matter, MDL No. 1285.

The execution of this Stipulation on behalf of Akzo Nobel N.V. shall be without prejudice to any defenses it may have, including, without limitation, lack of personal jurisdiction, improper venue, and insufficiency of service of process.

Dated: Washington, D.C.  
March \_\_, 2000

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By \_\_\_\_\_  
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Attorneys for Plaintiffs  
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Dated: New York, New York  
March 24, 2000

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Attorneys for Defendant  
Akzo Nobel N.V. in the  
captioned actions

SO ORDERED:

Thomas F. Hogan  
THOMAS F. HOGAN  
UNITED STATES DISTRICT JUDGE

Date: 4/10/00